Document 59

Filed 04/17/25

Page 1 of 4

Case 2:24-cv-00195-GMN-EJY

- 2. On April 10, 2025, the Court denied without prejudice Plaintiff's Motion for Leave to Amend Complaint for failing to attach the proposed amended complaint to the Motion in violation of Local Rule 15-1(a). Dkt. 55.
- 3. Plaintiff re-filed the Motion, with the proposed amended complaint attached, on April 10, 2025. Dkt. 56.
- 4. Plaintiff filed her final proposed amended complaint with the 22 exhibits referenced therein attached on April 14, 2025. Dkt. 57.
- 5. Equifax's response to the Motion is currently due by April 24, 2025. *See* Dkt. 56 Docket Entry Text.
- 6. On April 15, 2025, counsel for Equifax contacted counsel for Plaintiff to request an additional two weeks to respond to the Motion. The request was made to allow Equifax additional time to investigate the allegations in the final proposed amended complaint, as well as to analyze the more than 600 pages of exhibits attached thereto, and to accommodate Equifax's counsel's other professional commitments. Plaintiff's counsel indicated that she does not oppose Equifax's request.
- 7. Accordingly, all parties hereby stipulate, subject to the Court's approval, that Equifax's response to Plaintiff's Motion for Leave to Amend Complaint is due May 8, 2025. This is the first stipulation for extension of time Equifax has requested to respond to Plaintiff's Motion for Leave to Amend Complaint. This stipulation is filed in good faith and not intended to cause delay.

//

	Case 2:24-cv-00195-GMN-EJY Document 59 Filed 04/17/25 Page 3 of 4		
1	WHEDEFORE Defendant Equifox Information Services LLC respectfully requests that		
1 2	WHEREFORE, Defendant Equifax Information Services LLC respectfully requests that the Court grant this Stipulation and thereby extend its time to respond to Plaintiff's Motion for		
3	Leave to Amend Complaint to May 8, 2025.		
4	Respectfully submitted on April 17, 2025.		
5	[Signatures on following page]		
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22   23			
24			
25			
26			
27			
28			
	2		

1	CLARK HILL PLLC	FREEDOM LAW FIRM
2	By: /s/ Billie B. Pritchard	By: <u>/s/ Gerardo Avalos</u>
3	Gia N. Marina Nevada Bar No. 15276	George Haines Nevada Bar No. 9411
4	1700 S. Pavilion Center Drive, Ste. 500 Las Vegas, NV 89135	Gerardo Avalos
5	Las vegas, ivv 67133	Nevada Bar No. 15171 8985 South Eastern Ave., Suite 350
6	Zachary A. McEntyre (pro hac vice)	Las Vegas, Nevada 89123
7	Georgia Bar No. 653571	info@freedomlegalteam.com
8	Billie B. Pritchard ( <i>pro hac vice</i> ) Georgia Bar No. 460789	MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC
9	KING & SPALDING LLP 1180 Peachtree Street	·
	Atlanta, GA 30309	Scott C. Harris ( <i>pro hac vice</i> ) North Carolina Bar No. 35328
10	Attorneys for Defendant Equifax Information	900 W. Morgan Street
11	Services LLC	Raleigh, NC 27603 sharris@milberg.com
12		Gary M. Klinger (pro hac vice)
13		227 Monroe Street, Suite 2100
14		Chicago, IL 60606 gklinger@milberg.com
15		George F. Carpinello ( <i>pro hac vice</i> )
16		Adam R. Shaw (pro hac vice)
17		BOIES SCHILLER FLEXNER LLP 30 S. Pearl St. 12th Floor
18		Albany, NY 12207
19		gcarpinello@bsfllp.com ashaw@bsfllp.com
20		Attorneys for Plaintiff
21	ORDER	
22		
23	IT IS SO ORDERED on this 17th day of August, 2025.	
24	2 , 20 , 0	
25	Clayra Lybrician	
26	UNITED STATES MAGISTRATE JUDGE	
27		
28		